

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

NSI INTERNATIONAL, INC.,

Plaintiff,

v.

JINHUA FIDGET TOYS CO., LTD., et al.,

Defendants.

Case No. 24-cv-11073

Judge Lindsay C. Jenkins

Magistrate Judge Beth W. Jantz

PLAINTIFF’S MOTION FOR LEAVE TO EXCEED PAGE LIMITATION

Pursuant to Local Rule 7.1, Plaintiff NSI International, Inc. (“Plaintiff”) respectfully requests leave to file its Memorandum in Support of Plaintiff’s Motion for Summary Judgment and a Statutory Damages Award in excess of 15 pages.

Plaintiff is filing a single Motion for Summary Judgment and a Statutory Damages Award against four defendants, HONGBING Co.Ltd (Def. No. 33), HUAZAN Co.Ltd (Def. No. 35), SIJI Co.Ltd (Def. No. 43), and YISHAO (Def. No. 50) (collectively, the “Defendants”). Plaintiff’s brief contains necessary substantive content relevant to the Motion for each of the Defendants that should be considered, including analysis of a multi-factor test. Additionally, Plaintiff’s brief includes pages with images of Defendants’ listings. Plaintiff’s brief is only 18 pages, and Plaintiff respectfully requests that it be granted leave to file a brief in excess of 15 pages for the reasons stated herein.

Dated this 28th day of April 2025.

Respectfully submitted,

/s/ Justin R. Gaudio

Amy C. Ziegler
Justin R. Gaudio
Rachel S. Miller
Jennifer V. Nacht
Greer, Burns & Crain, Ltd.
200 West Madison Street, Suite 2100
Chicago, Illinois 60606
312.360.0080
312.360.9315 (facsimile)
aziegler@gbc.law
jgaudio@gbc.law
rmiller@gbc.law
jnacht@gbc.law

Counsel for Plaintiff NSI International, Inc

CERTIFICATE OF SERVICE

I hereby certify that on the 28th day of April 2025, I will electronically file the foregoing with the Clerk of the Court using the CM/ECF system. The CM/ECF system will send notice to the attorneys of record.

/s/ Justin R. Gaudio
Amy C. Ziegler
Justin R. Gaudio
Rachel S. Miller
Jennifer V. Nacht
Greer, Burns & Crain, Ltd.
200 West Madison Street, Suite 2100
Chicago, Illinois 60606
312.360.0080
312.360.9315 (facsimile)
aziegler@gbc.law
jgaudio@gbc.law
rmiller@gbc.law
jnacht@gbc.law

Counsel for Plaintiff NSI International, Inc